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FEB 21 2008

Air Protection Division (3AP12)

**Group Against Smog and Pollution
Clean Water Action**

February 18, 2008

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FEB 21 2008

Air Protection Division (3AP12)

Mr. Jim Thompson, Air Program Manager (Acting)
Allegheny County Health Department
301 39th Street, Bldg. #7
Pittsburgh, PA 15201-1891

Re: February 8, 2008 Letter - Complaint Concerning U.S. Steel - Clairton Works

Dear Mr. Thompson:

You called Rachel Filippini at GASP last week asking for a version of the video on the DVDs previously sent that would include a date and time stamp on the visuals.

Two sets of three DVDs are enclosed that will meet this request. Please note that my equipment did not allow me to adjust the location of the date-time stamp on the visual screen, so it sometimes intrudes on video imagery of interest. The video reproduction is of somewhat less quality compared to what was previously provided because I had to use analogue rather than digital transfer in order to show the date-time stamp on the output.

Again, on DVD-3, please ignore an incorrect speculative oral description in two places on the video of what I thought was Battery B as I did not obtain definitive information on battery descriptor identification until after this video was shot.

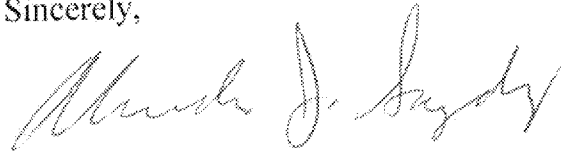
Also on DVD-3, there are 4 discreet segments shown:

- Video - morning of 10/30/2007
- Video - late afternoon of 10/30/2007
- Video - longest segment on 10/12/2007
- Video - morning of 10/30/2007


The last segment was inadvertently re-dubbed to disk and is a duplicate of the first video segment. As a result, please disregard the final 10/30/2007 material.

If you should have any questions and if any of these DVDs do not work and you need replacements, please call me at ajs@sagady.com or at (517)332-6971.

Sincerely,

A handwritten signature in dark ink, appearing to read "Alexander J. Sagady". The signature is fluid and cursive, with the first name "Alexander" being more prominent.

Alexander J. Sagady,
Environmental Consultant

cc. James Hagedorn - USEPA-Region III 

Group Against Smog and Pollution Clean Water Action

February 8, 2008

Mr. James Hagedorn (3AP12)
Air Enforcement Branch
Air Protection Division, Region III -
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103

Mr. Roger Westman, Air Program Manager
Allegheny County Health Department
301 39th Street, Bldg. #7
Pittsburgh, PA 15201-1891

**Re: Air Pollution Complaint Concerning U.S. Steel - Clairton Works
Additional Comment -ACHD Draft Title V Permit - USS Clairton Works**

Dear Mr. Hagedorn & Mr. Westman:

Group Against Smog and Pollution (GASP) and Clean Water Action (CWA) [hereafter noted as GASP-CWA] acknowledge the commitment to improving the environmental performance of its Clairton Coke Works that US Steel's recently announced \$1 billion capital investment program represents. We look forward to emission reductions that such an investment should produce in the coming years. Since the old coke oven batteries at the Clairton Works will continue to operate while the replacements are being constructed over the next several years, we believe strongly that, until they are decommissioned, proper maintenance and work practices should be observed all times at the existing batteries. Representatives of US Steel indicated at the January 22, 2008 Allegheny County Air Pollution Control Advisory Committee meeting that the company will spend the money necessary to maintain the existing batteries during the construction period and thereafter. It is with that commitment in mind and with the hope of quickly addressing existing emission problems that we issue this air pollution complaint letter.

GASP-CWA are filing this air pollution complaint with U.S. EPA Region III and with the ACHD Air Quality Program as a result of observations and videography conducted on October 12 and 30, 2007.

Enclosed please find three DVDs (or equivalent VHS videotape for Mr. Hagedorn) with our video observations. Each of these DVDs contains approximately one hour of video and is shown best if it is used in a DVD player rather than a portable computer; if any of these disks are defective or unuseable, please contact us for replacements. We apologize in advance for the more shaky video in DVD-3 which was all done on a hand held basis rather than with a tripod.¹

¹ In addition, please note that on DVD-3 the sound track contains two erroneous indications of what we thought was Battery B before we were able to finally confirm the descriptor names for all batteries onsite.

In addition to elements of this communication that are complaints of air pollution violations by U.S. Steel, we also have other observations supporting expressions of concern over certain U.S. Steel practices. It is our position that these practices do not reflect the type of environmental due diligence and stringent adherence to good air pollution control practice that is justified for this large facility that either causes or contributes to serious current and past PM 2.5 National Ambient Air Quality Standard (NAAQS) violations in the immediate area.

All of DVD-1 and DVD-2 were shot on October 30, 2007. The first two portions of DVD-3 were shot on October 30, 2007 and the remainder of the video segments shot from the street in Clairton in front of the facility were from October 12, 2007. In producing these copies, we did not display the date and time on the video images because of the potential of that display to obscure important information in the visual field. However, if you would like video reproduction showing the date and time, please contact us² and we'll provide such copies.

Specific Items of Non-Compliance

Charging Violations at U.S. Steel - Clairton Works Coke Battery "B" - 10/30/2007

At the end of DVD-1 and during a considerable interval on DVD-2 video imagery shows significant heavy emissions during apparent Battery B charging operations. Although we are aware of ACHD's prior enforcement order concerning Battery B, this order doesn't address the charging emissions non-compliance that we note herein.

We have not completed our regulatory analysis on U.S. Steel - Clairton Works at this writing. However, we note that ACHD's draft Title V permit contains the following provision that must reflect either some prior permit and/or ACHD requirement as to Battery B:

"The permittee shall not operate, or allow to be operated any Battery B coke ovens in such manner that the aggregate of visible charging emissions exceeds a total of 55 seconds during any five (5) consecutive charges on such battery."^{3 4}

In addition to the 55 second rule, our opinion is that the videos show violations of another rule as reflected in the Draft ACHD Title V permit for U.S. Steel:

² To obtain such material if you would like video copies with the date-time displayed, contact Alexander J. Sagady, Environmental Consultant [ajs@sagadv.com; (517)332-6971]

³ Draft ACHD Title V Permit for U.S. Steel-Clairton Works, Condition V.I.1.j

⁴ We also note similar requirements contained in the ACHD ordinance at §2105.21(a)(1)

“At all times including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the coke oven batteries and its pollution control equipment required under 40 CFR 63, Subpart L, in a manner **consistent with good air pollution control practices** for minimizing emissions to the levels required by any applicable performance standards under Subpart L. Failure to adhere to these requirements shall not constitute a separate violation if a violation of an applicable performance or work practice standard has also occurred.”⁵

Our video for October 30, 2007 shows incidents where even just a single charge indicates visible emissions during charging operations that exceed the 55 second visible emissions rule, let alone 5 consecutive charges (near end of DVD-1 and substantial portion of DVD-2). The video shows very significant emissions in which U.S. Steel does not appear to be exercising the required due diligence and care in controlling their emissions that would be necessary under the rubric of “good air pollution control practice.” Battery B in the videos is shown from a viewpoint with right hand perspective from the viewing point.

In making this complaint, we note that the monitoring requirements provided Battery B section of the Draft U.S. Steel Title V permit are grossly deficient to assure continuous compliance with the 55 second charging rule and other Allegheny County coke oven SIP-approved rules that address Battery B coke oven operations. In fact, the following language appears to tie the hands of any observer in making visible emission compliance determinations:

“Compliance shall not be determined more often than the schedule provided for performance tests in Condition V.1.3.c above.”⁶

Condition V.1.3.c articulates a single determination per day, 7 days a week.

While it is true that such a provision as Condition V.1.3.c exists in the Subpart L MACT standard, that restraint on the frequency of monitoring events for compliance determinations was never intended to apply to coke oven SIP rules on visible emission limitations which are provided elsewhere in section L. ACHD’s Draft Title V permit fails to articulate separate and distinguishable monitoring and reporting requirements to separately address the coke oven SIP visible emission limitations compliance duties. Any issuance of the permit in the present form will allow the company to operate grossly in violation of SIP limits at all times other than when a once daily Method 303 determination is made without creating any requirement to assure continuing and continuous compliance and without putting U.S. Steel under a burden to self-

⁵ Draft ACHD Title V Permit for U.S. Steel-Clairton Works, Condition L.1.1.e & 40 C.F.R. §63.310(a)

⁶ Draft ACHD Title V Permit for U.S. Steel-Clairton Works, Condition V.1.1.h (first clause).



"Thompson, James"
<jthompson@achd.net>
03/04/2008 05:06 PM

To: James Hagedorn/R3/USEPA/US@EPA
cc
bcc
Subject: RE: Clairton Complaint

Jim:

I expect to have something early next week from USS.

The consent agreement should be signed by the end of this week. The corrective action plan should correct the issues shown on the video.

USS will be rebuilding 25 heating walls on Battery #19 and 88 walls on #20. This is in addition to the 76 walls being rebuilt on Battery B. I will send you a copy of the agreement once it is final.

Jim Thompson
Acting Air Program Manager
Allegheny County Health Department
301 39th Street
Pittsburgh, PA 15201-1891
(412) 578-7963

-----Original Message-----

From: Hagedorn.James@epamail.epa.gov [mailto:Hagedorn.James@epamail.epa.gov]

Sent: Tuesday, March 04, 2008 10:13 AM
To: jthompson@achd.net
Subject: Clairton Complaint

Did USX ever get back to you on the reasons for all the smoke seen in the video sent by the GASP contractor? You said that ACHD was working on an agreement with USX and that something could be added to address the high amount of smoke seen on the video. Is that agreement going in that direction and when will the agreement be signed if you know? About how many more ovens need to be rebuilt at Clairton? Thanks for all your help on all of these cases.

report their violations of SIP visible emission limitations at times other than the single daily compliance test determination.

Such a circumstance is, and would be, inexcusably lax and allows the company to hide behind the permit shield while nearly continuously violating a SIP-related applicable requirements. ACHD must seriously address additional SIP-visible-emission-limit-related monitoring, recordkeeping and reporting requirements binding on U.S. Steel before the final Title V permit is issued. In addition, any failure to require continuous compliance with such SIP visible emissions limitations is likely to allow degraded emissions from the facility which cannot ensure attainment and maintenance on serious PM 2.5 NAAQS violations near this facility.

Failure to Light Off Soaking-Related Emissions

Each of the DVDs show one or more instances of oven standpipe emissions at times when such standpipe emissions are not lit off, thus releasing uncontrolled, uncombusted gaseous and particle emissions for a considerable period of time. Such operations do not appear to be acceptable or in compliance with U.S. Steel's submitted soaking work practices (See attachment #1). Uncontrolled, uncombusted soaking emissions are sources of PM 2.5, hazardous air pollutants, volatile organic compounds, carbon monoxide, reduced sulfur compounds and odors. Good air pollution control practice would dictate that such emissions not be allowed for more than an absolutely minimal amount of time.

Uncontrolled, uncombusted gas discharges from open oven standpipes constitute emissions of unburned coke oven gas. Operation of the U.S. Steel facility on October 30, 2007 with unlit, uncombusted standpipe emissions thus violates the ACHD ordinance §2105.21(h) which provides:

“Except as provided for in this Section, no person shall operate, or allow to be operated, any source in such manner that unburned coke oven gas is emitted into the open air.....”

Quenching Violations

The DVDs show 1 or more incidents, in addition to personal observations on October 12 and 30, 2007, of the following types of practices which are violations of applicable permits and ACHD rules:

Continuing operations of the main quench tower for Batteries 19-20 while the quench tower process unit was in degraded condition. Specifically, that quench tower displayed a number of large holes on its side that allowed significant quenching emissions to escape out of the side of the tower. To the extent that these emissions from the side of the tower

escaped below any baffles installed in the tower, such operations constitute poor air pollution control practice.

Operations of the main quench tower for Batteries 1-3 showed operations in which significant amounts of uncontrolled quenching process stream flow emissions escaped uncontrolled from the bottom of the tower during operations.

Operations of the two main quench towers for Batteries 1-3 and 7-9 in a manner so that the coke car was withdrawn from the base of the quench tower while still emitting significant amounts of energetic steam flow emissions that would not be directed to the respective quench towers but would instead be discharged uncontrolled to the atmosphere.

Each of the above constitute poor air pollution practice in the control of quenching-related emissions. Each of the conditions constitute violations of ACHD ordinance §2105.21(g) which requires that all uncontrolled quenching gases be directed through a suitable quench tower.

Other Areas of Concern

Other Soaking Issues

In general, during observations on October 30, 2007 and very late afternoon on October 12, 2007, numerous instances were observed of long periods of soaking emissions, including heavy visible emissions from such soaking/decarbonization practices from several batteries at the complex. Long soaking emissions with significant particulate emissions is a sign that U.S. Steel may not be properly implementing their work practice requirements by failing to bank ovens with heating problems or failing to take heat delays (See Attachment #1), and by failing to properly maintain their ovens to avoid heating problems. Allowing long soaking periods with heavy emissions in order to avoid green pushes instead of requiring more extended heating periods and more promptly implemented oven heating wall/end flue repairs means that U.S. Steel emits more particulate pollution from a coke oven process vent emission source controlled with RACT rules by other air pollution control jurisdictions.⁷ So far, ACHD has not adopted any such soaking/decarbonization RACT rules.

⁷ For example, U.S. Steel is subject to a RACT rules in Indiana which limits the opacity of soaking emissions to 40% (instantaneous basis) starting 2 minutes after a standpipe cap is opened.

Heavy Door Leak Emissions

During the afternoon of October 30, 2007, we noted very heavy emissions from door leaks from certain ovens in the southern portion of the complex (Batteries 1-3; 7-9). Some of these are shown on DVD-3 and occasionally on DVD-1. While ACHD has a rule prohibiting door leak emissions from exceeding 40% opacity 15 minutes after an oven has been charged⁸, ACHD's draft Title V permit creates no monitoring duties binding on U.S. Steel which can ensure continuous compliance with this requirement at times other than the limited time when a Method 303 inspection is underway at any particular battery. As a result, under the language of this proposed Title V permit, U.S. Steel will be absolutely free to ignore any such problems at all times other than when any daily Method 303 determination is taking place.

ACHD personnel have made statements about ACHD requirements being the most stringent in the U.S. as to controlling emissions from the U.S. Steel Clairton Works. However, in fact, PA Department of Environmental Protection door leak requirements at 025 Pa. Code § 129.16 (See Attachment #2) provide more specific and stringent inspection, monitoring and work practice requirements than is present in ACHD regulations when serious door leak emissions occur. Nothing like the door leak inspection, monitoring and work practice requirements contained in 025 Pa. Code § 129.16 is required in ACHD's draft Title V permit. This PADEP regulation requires certain affirmative duties for problem resolution and potentially required door replacement after observed serious door leak problems that are not envisioned in ACHD's planned monitoring and enforcement elements in its draft Title V permit.

Observation of Heavy Visible Emissions from Coke Screen Building Monitors

DVD-3 contains one video segment showing heavy emissions from the building vent monitors on the coke screen building for Batteries 1-3/7-9.

Heavy Topside Emissions Battery B

DVD-2 shows evidence of heavy topside emissions from Battery B on October 30, 2007, although the exact location of such emissions could not be determined from the available viewpoint.

⁸ ACHD ordinance §2105.21(b)(4)

Green pushes; Yellow Soaking Emissions

DVD-3 shows at least one or more incidents of green pushes and yellow soaking emissions on October 12, 2007 in the very late afternoon from Batteries 19-20. Heavy yellow emissions may be evidence of collector main gases escaping through leaking dampers during soaking operations.

Unacceptable Charging Emissions on Older Batteries

There is some indication from video in DVD-1 and DVD-2 of charging operations on the older batteries in the southern portion of the Clairton complex showing unacceptable heavy and enduring emissions.

For any written reply purposes, please direct any written responses to the following individuals and offices:

Rachel Filippini, Executive Director
Group Against Smog and Pollution
Wightman School Community Building
5604 Solway St., #204
Pittsburgh, PA 15217

Myron Arnowitt
Pennsylvania State Director
Clean Water Action
100 Fifth Ave., #1108
Pittsburgh, PA 15222

This concludes our complaint and comments. If you should have any questions about this letter, please do not hesitate to contact me at (517)332-6971.

Sincerely,

GROUP AGAINST SMOG AND POLLUTION
CLEAN WATER ACTION



Alexander J. Sagady
Consultant to GASP-CWA

cc: George F. Babcoke, US Steel (w/o enclosures)
Vice President of Plant Operations
United States Steel Corporation
600 Grant Street – Room 1614
Pittsburgh, PA 15219-2800

Attachment #1



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APR 17 2006

**ALLEGHENY COUNTY HEALTH DEPT.
AIR QUALITY PROGRAM**

April 12, 2006

Roger C. Westman, Ph.D.
Allegheny County Health Department
Department of Air Quality
301 Thirty-ninth Street
Pittsburgh, PA 15201

Subject: 40 CFR 63 Subpart CCCCC (Coke MACT)
Soaking Work Practice Plan

Dear Dr. Roger Westman:

I am enclosing the Soaking Work Practice Plan as required by 40 CFR 63 Subpart CCCCC (Coke MACT) Section 63.7327(d)(1) for United States Steel Corporation Clairton Coke Works.

Please refer questions on this matter to Ms. Coleen M. Davis at (412) 233-1015.

Very truly yours,

A handwritten signature in cursive script, reading "Mark D. Whalen". The signature is written in dark ink and is positioned above the printed name.

Mark D. Whalen
General Manager, Mon Valley Works

cc: Judith Katz, EPA III

Enclosure

**United States Steel Corporation
Clairton Works**

**40 CFR 63 Subpart CCCCC
National Emission Standards for Hazardous Air Pollutants
For Coke Ovens: Pushing, Quenching and Battery Stacks**

Site-Specific Soaking Work Practice Plan
(63.7294 (a))

April 2006

5.0 Scope

This plan will address emissions that occur during soaking. Soaking starts when an oven is dampered off the collecting main and vented to the atmosphere through an open standpipe prior to pushing and ends when the coke begins to be pushed from the oven.

The Site-Specific Soaking Work Practice Plan applies to all Clairton batteries as follows:

- Battery 1 consisting of 64 3-meter ovens
- Battery 2 consisting of 64 3-meter ovens
- Battery 3 consisting of 64 3-meter ovens
- Battery 7 consisting of 64 3-meter ovens
- Battery 8 consisting of 64 3-meter ovens
- Battery 9 consisting of 64 3-meter ovens
- Battery 13 consisting of 61 3-meter ovens
- Battery 14 consisting of 61 3-meter ovens
- Battery 15 consisting of 61 3-meter ovens
- Battery 19 consisting of 87 4-meter ovens
- Battery 20 consisting of 87 4-meter ovens
- B Battery consisting of 75 6-meter ovens.

5.1 Training

- 5.1.1 It will be the responsibility of the Area Manager, Coking Operations to ensure that all Qualified Persons performing the lidding function are trained in this procedure and their training is properly documented and recorded according to Clairton's Environmental Management System requirements. (63.7294(a)(1))
- 5.1.2 Corrective action is required during the soaking process any time emissions are visible from the standpipe opening.

5.2 Dampering Off (63.7294(a)(2))

- 5.2.1 The Lidman (UP assigned to lids) will begin the dampering off process by closing the damper (lowering the damper arm) on the side opposite of the side that already has the damper closed.
- 5.2.2 If a damper has not been previously closed, close one damper without opening the cap and then proceed to the opposite side and close the other damper.

- 5.2.3 A "metallic clank" will be heard when the damper is properly closed. If the sound from closing the damper is muffled or dull in nature, open and close the damper several times to dislodge tar accumulation from the dish.
- 5.2.4 If opening and closing the damper dish several times does not allow a "metallic clank" sound to be obtained, open the valve to inject a small amount of steam.
- 5.2.5 Raise the cap.
- 5.2.6 Move to the other side of the oven (arm already down) and turn the valve to inject steam while observing the other standpipe opening. After a few seconds, quickly turn the valve to the off position to remove the steam. The steam will cause a slight "pop" which indicates air has been drawn into the standpipe and will ignite combustible gases / soaking emissions.
- 5.2.7 Wait a few seconds to allow the dish to re-fill with flushing liquor and raise the remaining cap. This will complete the isolation of the oven from the collector main.
- 5.2.8 If the damper dish will not close, turn the aspirating steam valve to inject a minimal amount of steam into the standpipe/gooseneck prior to opening the standpipe cap.
- 5.2.9 Report the inoperable damper dish to initiate a repair.
- 5.2.10 Observe each standpipe opening. If there is flame or no visible emissions, proceed to the next lidding function.
- 5.2.11 If the visible emissions do not automatically ignite, follow the corrective action steps in section 5.5.

5.3 Determine the Source of Soaking Emissions (63.7294(a)(3))

- 5.3.1 Determine if the emissions are coming from the collector main:
 - 5.3.1.1 Can not hear a "metallic clank" when attempting to reseal the dish
 - 5.3.1.2 Emissions appear orange, brown or yellow and are eliminated when aspirating steam is turned on indicates that the emissions are coming from the collector main. This condition is commonly known as a "bleeder".
 - 5.3.1.3 Heaviest emissions coming from the top area of the gooseneck.
- 5.3.2 Determine if the emissions are coming from incomplete coking (green oven);
 - 5.3.2.1 The introduction of aspirating steam does not reduce the emissions.
 - 5.3.2.2 Emissions from incomplete coking will usually appear gray, black or dark green.
 - 5.3.2.3 To confirm that the emissions are coming from the oven, the #1 or #4 lid can be partially opened for observation of the coke mass.
 - 5.3.2.4 Emissions coming uniformly from the opening.
 - 5.3.3.5 If there are no soaking emissions when the oven is dampered off from the collecting main, soaking emissions may occur when the coke oven door is removed. This may result from an improper flushing pattern inside the gooseneck, which causes a small amount of flushing Liquor to penetrate the interior of the

standpipe, which will result in soaking emissions when the air is drafting up through the standpipe when the door is removed.

5.3.3.6 Emissions appear yellow or brown.

5.4 Corrective measures to Reduce or Eliminate Soaking Emissions (63.7294(a)(4))

5.4.1 If the visible emission have not ignited automatically, follow the table below to reduce or minimize the emissions;

Root Cause	Corrective Action	Operation
Incomplete coking or "bleeder"	Ignite emissions	1) Briefly inject steam on opposite side. Close the standpipe cap opposite the one with emissions, partially raise the damper arm and inject a minimal amount of steam. After the emissions on the opposite side ignite, close the damper, turn off the steam and reopen the standpipe cap.
Incomplete coking or "bleeder"	Ignite emissions	2) Manually ignite emissions. Use sparking tool or other method to ignite the emissions
"Bleeder"	Address emissions	3) Turn on a minimal amount of steam. Turn off the steam after the charge is complete.
Incomplete coking	Address emissions	4) Put the standpipe cap into the down position. Lower the standpipe cap to cover the emissions and ensure that the emissions do not increase on the other side
Incomplete coking	Address emissions	5) Partially open / remove the lid closest to the standpipe. Notify others in the vicinity of the partially removed lid.
Incomplete coking	Address emissions	6) Bank oven or consider taking heat delay. See section below
Soaking emissions occur after door is removed	Correct flushing pattern inside gooseneck	1) Close standpipe cap to stop emission source from escaping coke oven 2) Replace coke oven doors for oven 3) Put aspirating steam in standpipe to check flushing spray pattern 4) Open damper for standpipe to be checked 5) Open standpipe cap and check flushing spray pattern, clean and adjust as needed, ensure that all of the Flushing Liquor is going into the collector main and no Flushing Liquor is going into standpipe 6) Bank Oven, notify Heaters

- 5.4.2 If the soaking emissions do not ignite by the methods 1-5 above.
 - 5.4.2.1 Bank the oven - Notify the shift manager, heaters, door machine and pusher machine operators immediately so that the doors are not removed. Put the caps down and the damper arms up to put the oven back on the main and continue coking. If the doors have been removed, the doors must be replaced before closing the caps and opening the dampers.
 - 5.4.2.2 Evaluate for heat delay - Notify the shift manager (or representative) and heaters to evaluate the need for a heat delay.
63.7294(a)(5)
- 5.4.3 Further investigation and/or corrective actions may be necessary to ignite the soaking emissions or decide to not push the oven.
- 5.4.4 The shift manager will record the following on the "Oven Delays and Machine Repairs" report;
 - 5.4.4.1 "Banked oven - soaking emissions"
 - 5.4.4.2 "Heat delay - soaking emissions"
 - 5.4.4.3 "Damper dish problem" and oven designation

Attachment #2

§ 129.16. Door maintenance, adjustment and replacement practices.

(a) In the event a coke oven battery fails to comply with the emission standards contained in § 123.44(a)(2) or (3) (relating to limitations of visible fugitive air contaminants from operation of any coke oven battery) at any time after the effective date of the standards at a coke oven battery, the person responsible for the operation of such coke oven battery shall take the following action:

(1) Implement the following work practices:

(i) *Self-sealing coke oven doors.*

Work practices for self-sealing coke oven doors shall conform with the following:

(A) Within 1 hour after the charge of each oven, the oven doors shall be inspected for visible emissions, and doors found leaking shall be recorded.

(B) Doors leaking 1 hour after the charge shall be adjusted prior to the end of the second hour after the charge.

(C) Each oven door leaking 1 hour after the charge shall be reinspected for visible emissions 2 hours after the charge. A record shall be made of a door leaking 2 hours after the charge.

(D) A door leaking 2 hours after each of two successive charges shall be replaced with a repaired, rebuilt or new door prior to the next charge to that oven.

(E) An adequate supply of repaired, rebuilt and new doors shall be maintained onsite to allow the frequency of replacement necessary to comply with this subsection.

(F) If a newly installed, repaired, rebuilt or new door leaks more than 2 hours after charge, the door and jamb shall be inspected when the door is next removed from the oven. If the door is found to be defective, it shall be replaced with a repaired, rebuilt or new door prior to the next charge to that oven. If the door is not found to be defective, the jamb shall be replaced prior to the next charge to that oven.

(ii) *Luted doors.* Work practices for luted doors shall conform with the following:

(A) Luted doors leaking 15 minutes after the charge shall be immediately reluted.

(B) Doors which fail to seal after the first reluting shall be recorded.

(C) Leaks appearing after the first reluting shall be immediately alluted.

(iii) *Chuck doors.* Work practices for chuck doors shall conform with the following:

(A) Within 1 hour after the charge of each oven, the chuck door shall be inspected and a door found leaking shall be recorded.

(B) Chuck doors leaking 1 hour after the charge shall be gasketed prior to the next charge to that oven.

(C) If a freshly gasketed door is leaking 1 hour after the charge, it or the oven door shall be replaced prior to the next charge to that oven.

(iv) *Cleaning.* Doors and jambs shall be completely cleaned prior to each charge.

(2) Keep and maintain records of the inspections required by paragraph (1), including the names of inspectors, the date and time of each door inspection and ovens observed leaking.

(3) Within 90 days following a determination by the Department or the battery operator that this section is applicable, the person responsible for the operation of a coke oven battery shall submit to the Department for approval a work practice and maintenance manual which shall include, but not be limited to, the job titles of persons having responsibility for the various tasks required by paragraph (1), specify procedures to be followed to assure implementation of the requirements of paragraph (1), and state the numbers of replacement doors and jambs to be kept on site for each battery.

(b) In addition to, or as a substitute for, the requirements of subsection (a)(1)–(3), the Department may issue an order establishing further obligations with respect to the control of door area emissions in the event compliance with § 123.44(a)(2) and (3) is not consistently achieved within the time allowed by an approved deferred compliance schedule. The obligations may include, but is not limited to, the specification of the maintenance and work practices as the Department finds will achieve consistent compliance with the standards and the installation of best available technology for door sealing or for the capture and cleaning of door area emissions.

Source

The provisions of this § 129.16 adopted August 12, 1977, effective December 12, 1977, 7 Pa.B. 2251.

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